



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

APR 7 2010

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

Paul Donndelinger, VP Engineering
Cooley, Incorporated
50 Esten Avenue
Pawtucket, Rhode Island 02860

Re: Clean Air Act Reporting Requirement

Dear Mr. Donndelinger:

The United States Environmental Protection Agency ("EPA") is evaluating whether Cooley, Incorporated of Pawtucket, Rhode Island ("Cooley") is in compliance with the Clean Air Act (the "Act") and federal regulations promulgated under the Act, including, but not limited to the National Emission Standards for Hazardous Air Pollutants for Printing, Coating and Dyeing of Fabrics and Other Textiles ("Fabric MACT"), 40 C.F.R. Part 63, Subpart OOOO.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act. Therefore, within 45 days of receipt of this letter, Cooley is required to provide all of the information outlined below for the Pawtucket facility. Provide a separate numbered response to each paragraph or subparagraph below.

- 1) Provide the following information about Cooley's current facility located at 50 Esten Avenue in Pawtucket, Rhode Island ("the Pawtucket facility"):
 - a) Describe the ownership and business structure;
 - b) Indicate the date and State of incorporation;
 - c) List any partners or corporate officers;
 - d) List any parent and subsidiary corporations;
 - e) Provide the number of employees at the Pawtucket facility;
 - f) Provide the net worth of the company; and
 - g) Provide the date that Cooley began operations at the Pawtucket facility.

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

- 2) Provide the following information and corresponding documentation associated with the Stork Rotary Printer and associated cleaning processes:
- a) The date on which Cooley began using Thinner 27342 to clean printer squeegee blades;
 - b) The date on which Cooley ceased using Thinner 27342 to clean printer squeegee blades;
 - c) The total quantity of Thinner 27342 used in tanks 1 and 4 on a monthly basis during the time period May 2006 to the present. Specify how Cooley determined the total volume of thinner used in the tank each month;
 - d) Copies of hazardous waste manifests generated in accordance with the requirements of 40 CFR § 262.23 to track the off-site shipment of any waste thinner, sludge, or solvent containing rags that were generated in conjunction with the printer squeegee blade cleaning process during the timeframe specified above in a) through b) above;
 - e) If solvent containing rags were not shipped off site as hazardous waste, provide copies of any other tracking documentation used to document the shipment of these materials from the Cooley facility;
 - f) The names of any other thinning, cleaning or degreasing solvents used to clean squeegee printer blades during the period May 2006 to present;
 - g) The dates that solvents referenced in f) above were used, and the total quantity of such solvent used each month;
 - h) Copies of Material Safety Data Sheets, Technical Specifications, Environmental Data Sheets or other supporting technical documentation indicating the chemical composition of solvents referenced in f) above.
- 3) Cooley has indicated in submittals made to EPA in accordance with the Fabric MACT that the following printing inks were used in the period January-June 2009: TC 98-5159; CB ink; CBL ink, TC 99-1009; and TC 90-1016. For each of these inks, provide copies of Material Safety Data Sheets specifying the HAP content of the ink.
- 4) During EPA's inspection on June 17, 2009, inspectors viewed the La Maire coating line, referred to as Coater # 5. As of the date of the inspection, EPA was informed that cleaning of coating line equipment was conducted using methyl ethyl ketone (MEK), a delisted HAP. For the La Maire coating line, please provide the following information:
- a) The date on which Cooley began cleaning coating process equipment using MEK;
 - b) The names of any other solvents that Cooley has used to clean coating process equipment during the period May 2006 to present;
 - c) Copies of Material Safety Data Sheets, Technical Specifications, Environmental Data Sheets or other supporting technical documentation indicating the chemical composition of the solvents referenced in b) above, and whether these solvents contain HAPs;
 - d) The total quantity of solvents referenced in b) above used each month during the period May 2006 to present.

Mail the submissions required by this letter to:

Susan Studlien, Director
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100, OES04-2
Boston, Massachusetts 02109-3912
Attn: Joan Jouzaitis, Air Technical Unit

Be aware that if Cooley does not provide the requested information, EPA may order Cooley to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Federal law also establishes criminal penalties for providing false information to EPA. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act.

Cooley may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Note that certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Cooley.

If you have any questions regarding this reporting requirement, please contact Joan Jouzaitis, Environmental Engineer at (617) 918-1846 or have your attorney call Thomas T. Olivier, Senior Enforcement Counsel at (617) 918-1737.

Sincerely,



Susan Studlien, Director
Office of Environmental Stewardship

cc:

Ted Burns, RI DEM
Karen Peltier, RI DEM
Dean Albro, RI DEM

